

1 Andrew Williams, Esq.
2 CA bar #: 310526 - pro hac vice admit
3 **The Williams Law Group**
4 6273 Sunset Drive
5 Suite D3
6 South Miami, Florida 33143
7 Telephone: (253) 970-1683
8 Email: Andrew@TheWilliamsLG.com

9 David Lee Phillips, Esq.
10 NV bar #: 538 - local counsel
11 700 S. 4th Street
12 Las Vegas, NV 89101
13 Telephone: (702) 595-9097
14 Email: DavidLeePhillips@aol.com

15 *Attorneys for Plaintiff, Steven
16 Johnson*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 STEVE JOHNSON

20 Plaintiff,
21 v.

22 HILV FEE, LLC; NAV-115 E. TROPICANA,
23 LLC; LAS VEGAS METROPOLITAN POLICE
24 DEPARTMENT; LAS VEGAS METROPOLITAN POLICE
25 OFFICER A; LAS VEGAS METROPOLITAN POLICE
26 OFFICER B; LAS VEGAS METROPOLITAN POLICE
27 OFFICER C; LAS VEGAS METROPOLITAN POLICE
28 OFFICER D; LAS VEGAS METROPOLITAN POLICE
29 OFFICER E; LAS VEGAS METROPOLITAN POLICE
30 OFFICER F; LAS VEGAS METROPOLITAN POLICE
and DOES 9 to 50

31 Defendants.

32 Case No. 2:18-cv-01381-RFB-BNW

33 **PLAINTIFF'S SECOND UNOPPOSED
34 MOTION FOR EXTENSION OF TIME TO
35 FILE A REPLY BRIEF TO DEFENDANTS
36 HILV FEE, LLC AND NAV-115 E.
37 TROPICANA, LLC'S RESPONSE IN
38 OPPOSITION TO PLAINTIFF'S MOTION TO
39 ADD CLAIM/AMEND PLEADINGS [DE 86]**

40 NOW COMES Plaintiff, Steve Johnson ("Plaintiff"), by and through
41 the undersigned, and hereby submits this Second Unopposed Motion for
42 Extension of Time to File a Reply Brief to Defendants' HILV Fee, LLC and
43 NAV-115 E. Tropicana, LLC's Response in Opposition to Plaintiff's Motion

1 to Add Claim/Amend Pleadings [DE 86] (the "Motion for Extension of Time")
2 pursuant to Rule 6(b) of the Federal Rules of Civil Procedure ("FRCP").

3 In support of this motion, Plaintiff shows unto the Court the
4 following:

5 1. Plaintiff was served with Defendants' Response in Opposition to
6 Plaintiff's Motion to Add Claim/Amend Pleadings (the "Opposition") [DE
7 86] on May 18, 2020.

8 2. Plaintiff's reply brief was due by 11:59 pm PST on May 25, 2020;
9 however, because May 25, 2020, was a federal/national holiday, the date
10 to file the reply brief was automatically extended to 11:59 pm PST on
11 May 26, 2020. The time for Plaintiff to reply to the Opposition therefore
12 has not yet expired.

13 3. Due to an appellate brief deadline before the Eleventh Circuit
14 Court of Appeals, which also due on or around May 26, 2020, Plaintiff's
15 counsel was unable to devote the necessary time to complete the Reply
16 brief.

17 4. Plaintiff's counsel spoke with counsel for Defendant HILV Fee,
18 LLC and NAV-115 E. Tropicana, LLC (collectively, the "Hooters
19 Defendants"), and explained the situation to them and his desired
20 request for a brief extension of time of one-week to file a Reply.

21 5. Counsel for the Hooters Defendants confirmed that they had no
22 objection to the extension of time and confirmed such via email on May
23 26, 2020.

24 4. Due to a medical issue a medical issue (thankfully, not COVID-
25 19 related) and the current events of our country, which led to

1 closures of the undersigned's office over the weekend, the undersigned
2 contacted counsel for the Hooters Defendants' to inquire into their
3 amenability to granting Plaintiff a 24-hour extension in which to file
4 his Reply brief.

5 5. Opposing counsel graciously proposed that the undersigned take
6 until the end of the week (Friday, June 5, 2020) to file Plaintiff's
7 reply brief, to which the undersigned accepted.
8

9 6. Pursuant to the approve-extension of time by opposing counsel,
10 Plaintiff seeks to have until 11:59 pm PST to complete and file his
11 Reply brief.

12 7. This motion is made in good-faith and not for the purpose of
13 causing any needless and/or undue delay.

14 **WHEREFORE**, Plaintiff respectfully requests that this Court grant
15 his motion and permit Plaintiff with an extension of time, up to and
16 including, the 5th day of June, 2020, in which to file and serve a Reply
17 to the Opposition.
18

19 Respectfully submitted,

The Williams Law Group

20 Dated: June 1, 2020

BY: Andrew Williams

21 ANDREW WILLIAMS, ESQ.

22 CA bar #: 310526 - pro hac vice admit
6273 Sunset Drive, Suite D-3
South Miami, Florida 33143
Telephone: (305) 916-1122
Email: Andrew@TheWilliamsLG.com

23 **IT IS SO ORDERED**

24 **DATED: June 05, 2020**

25 DAVID LEE PHILLIPS, ESQ.

26 NV bar #: 538 - local counsel

700 S. 4th Street

Las Vegas, NV 89101

Telephone: (702) 595-9097

Email: DavidLeePhillips@aol.com

27 
BRENDA WEKSLER

28 Attorneys for Plaintiff Steve Johnson

29 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of June 2020, a copy of the foregoing **PLAINTIFF'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A REPLY BRIEF TO DEFENDANTS HILV FEE, LLC AND NAV-115 E. TROPICANA, LLC'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION TO ADD CLAIM/AMEND PLEADINGS [DE 86]**, was served electronically and sent to the following address/individuals:

TYSON & MENDES, LLP

THOMAS E. MCGRATH, ESO.

CHRISTOPHER A. LUND, ESO

3960 Howard Hughes Parkway

Suite 600

Las Vegas, NV 89169

Email: clund@tysonmendes.com

Attorneys for Defendant

Fee, LLC and N

/s/Andrew Williams

The Williams Law Group